



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAY 17 2016

Mr. James Robellard
Maintenance Supervisor
Cambridge International
105 Goodwill Road
Cambridge, MD 21613-2980

Re: **Notice of Violation**
Compliance Evaluation Inspection
July 7, 2015
EPA ID No. MDD003064334

Docket Number: R3-16-NOV-RCRA-018

Dear Mr. Robellard:

On July 7, 2015, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") at Cambridge International in Cambridge, MD ("The Facility") under the Code of Maryland Annotated Regulations ("COMAR") and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq. The inspection report is enclosed. Based on that inspection and a review of other pertinent information, EPA has determined that the facility is violating regulations under the COMAR and RCRA. As a result of this determination, the EPA is issuing this **Notice of Violation (NOV)**. The specific violation is:

1. The Land Disposal Restriction Form corresponding to the hazardous waste and destination facility listed on Hazardous Waste Manifest #010968539JJJ, dated February 12, 2013, was not available for review at the time of the inspection pursuant to 40 CFR §268.7 (a)(8) which requires generators to retain copies on-site for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.
2. Universal Waste Lamps observed in the Electrical Shop Universal Waste Accumulation Area were not contained or in opened, unlabeled, undated containers (Photos #2, #3, #4, #5 and #6). as required by [40 CFR §273.13 (d)(1)]
 - a. The observed Universal Waste Lamps were not contained pursuant to COMAR 26.13.10.15.B.1 [40 CFR §273.13 (d)(1)] which requires that Universal Waste

Lamps be stored in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

- b. The observed Universal Waste Lamps were not labeled pursuant to COMAR 26.13.10.17.A.2.e [40 CFR §273.14 (e)] which requires that each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste – Lamp(s)”, or “Waste Lamp(s)”, or “Used Lamp(s)”.
 - c. The observed Universal Waste Lamps were not dated pursuant to COMAR 26.13.10.17.B.3.b [40 CFR §273.15 (c)(1)] which requires placing universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received.
3. The observed start accumulation date marked on the “Excluded Solvent Contaminated Wipes” container in the facility’s Oil Storage Area was 6/27/13, 741 days from the date of the inspection, 561 days greater than 180 days pursuant to 40 CFR §261.4 (b)(18)(ii), which allows for accumulation of Excluded Solvent Contaminated Wipes up to 180 days from the start date of accumulation for each container prior to being sent for disposal.

In addition to the above listed RCRA and COMAR violations, a change in some of the facility’s waste disposal procedures was recently brought to the attention of the EPA by Maryland Environmental Service. As of March 31, 2016, Cambridge International was to immediately cease discharging into the municipal waste water system, have the wash and rinse tank waste tested, and obtain a permit prior to reassuming said discharge. This change in waste handling procedures raises concerns regarding Cambridge International’s compliance with the COMAR regulations for Generators of Hazardous Waste per COMAR 26.13.02.05A (1). Listed below are some of the basic obligations of hazardous waste generators and is provided only as a sample of the type of requirements. This list is not to be considered a comprehensive guide. Further requirements should be sought in 40 CFR §260 to §299 and COMAR 26 §13 to §15, as well as other consulting services, as needed, in order to avoid non-compliance with these laws and to reduce the risk of threat to human health and the environment.

Generators of Hazardous Waste in Maryland:

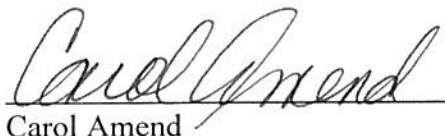
1. Monthly hazardous waste generation rate of ≥ 100 kg/mo. non-acute wastes = LQG status
2. Monthly hazardous waste generation rate of > 1 kg/mo. acute wastes = LQG status
3. Make hazardous waste determinations
4. Use transporters and TSD facilities with EPA ID numbers
5. Use the Uniform Hazardous Waste Manifest
6. Comply with DOT shipping requirements
7. Hazardous waste accumulation time limit of 90 days (containers to be labeled and dated)
8. The use of Land Disposal Restriction forms is required
9. Personnel training requirements
10. Biennial reporting is required
11. Maintaining a Contingency Plan is required

Within twenty (20) calendar days of the receipt of this NOV, please submit a response documenting the measures the facility has taken or is taking to achieve compliance with the violations noted above or provide an explanation of facts and circumstances that cause you to believe that EPA's determination of the alleged violations are in error. If the compliance measures identified are planned or are on-going, please provide a schedule for when the compliance measures will be completed.

Section 3008(a) of RCRA authorizes EPA to take an enforcement action whenever it is determined that any person has violated, or is in violation, of any requirement of RCRA as amended. Such an action could include a penalty of up to \$37,500 per day of violation. In addition, failure to achieve and maintain compliance with the regulations cited in this Notice of Violation may be treated as a repeated offense and may constitute a "knowing" violation of Federal law.

This Notice of Violation is not intended to address all past violations, nor does it preclude EPA from including any ongoing, including the one cited in this letter, or past violations in any future enforcement action. Any response to this NOV shall be addressed to:

Eric Greenwood 3LC70
U.S. Environmental Protection Agency - Region III
1650 Arch Street
Philadelphia, PA 19103
215-814-2057



Carol Amend
Associate Division Director
Land and Chemicals Division
Office of Land Enforcement

May 17, 2016
Date

Enclosure

cc: B. Coblenz, MDE w/o Enclosure
P. Belgiovane (3LC70) w/o Enclosure
E. Greenwood (3LC70) w/o Enclosure